

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KEITH TAYLOR

Defendant.

**Affirmation in Support of
Application for Order of
Continuance**

24 Mag. 2130

State of New York)
County of New York : ss.:
Southern District of New York)

Rebecca R. Delfiner, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed, pursuant to Rule 5.1(d) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3161(h)(7)(A). This is the second order of continuance that has been sought in this case.

2. The defendant was charged in a complaint dated June 4th, 2024, with violations of 18 U.S.C. §§ 1343, 1028A, and 2, and 26 U.S.C. § 7201. The defendant was arrested on June 11, 2024, and was presented in this District before Magistrate Judge Sarah L. Cave on that same date, at which proceeding the defendant was represented by Brian Ketcham, Esq., and released on conditions.

3. At the presentment on June 11, 2024, a preliminary hearing was scheduled for July 11, 2024, after defense counsel consented to extend the deadline within which to conduct a

preliminary hearing. Under the Speedy Trial Act, the Government had until July 11, 2024, to file an indictment or information. *See* 18 U.S.C. § 3161(b).

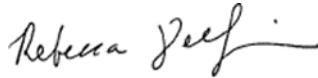
4. On July 9, 2024, Magistrate Judge Sarah Netburn entered an Order of Continuance, pursuant to Rule 5.1(d) and 18 U.S.C. § 3161(h)(7)(A), extending the time within which a preliminary hearing would have to be conducted or an indictment or information would have to be filed in this case until August 12, 2024.

5. Defense counsel and I have had discussions regarding a possible disposition of this case. The parties plan to continue our discussions, but do not anticipate a resolution before August 12, 2024.

6. Therefore, the Government requests a continuance until September 11, 2024, to continue the foregoing discussions toward resolving this matter. On August 5, 2024, I personally corresponded with defense counsel, who specifically consented to this request. This application has been authorized by Assistant United States Attorney Andrew Dember, Deputy Chief of the Criminal Division.

7. For the reasons stated above, good cause supports the extension of the preliminary hearing deadline, and the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
August 6, 2024



Rebecca R. Delfiner
Assistant United States Attorney
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